

COVINGTON

BEIJING BRUSSELS DUBAI FRANKFURT JOHANNESBURG
LONDON LOS ANGELES NEW YORK PALO ALTO
SAN FRANCISCO SEOUL SHANGHAI WASHINGTON

Covington & Burling LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
T +1 212 841 1000

July 23, 2021

By E-mail and ECF

The Honorable Naomi Reice Buchwald
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.

Re: *United States v. Reggie Chin*, 06 Cr. 80 (NRB)

Dear Judge Buchwald:

We write on behalf of our client Reggie Chin to request with consent of the Government that the conference scheduled for August 9 be rescheduled to September 13 or such date thereafter that is convenient for the Court. This conference was initially scheduled for June 16, 2021, and was adjourned once before to August 9, 2021. *See* Docket No. 351.

The parties continue to engage in discussions concerning a potential resolution of the matter, and the additional time requested should enable the parties to determine whether such a resolution is possible. We consent to an exclusion of time under the Speedy Trial Act on that basis.

Should the parties reach an agreement prior to the rescheduled conference, we request permission to contact the Court to seek an earlier date for a plea proceeding.

Respectfully submitted,


/s/ Arlo Devlin-Brown

Arlo Devlin-Brown
Katherine P. Onyshko

cc (by ECF):
Danielle M. Kudla
Patrick Ryan Moroney
Assistant United States Attorneys

Application granted. The conference scheduled for August 9, 2021 at 10:30 a.m. is adjourned until September 13, 2021 at 10:30 a.m. The Court excludes time under the Speedy Trial Act until that date. See 18 U.S.C. § 3161(h) (7) (A).

SO ORDERED.


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: New York, N.Y.
July 26, 2021